

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FAMILIAS UNIDAS POR LA JUSTICIA,
AFL-CIO, a labor organization

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
LABOR, and LORI CHAVEZ-DeREMÉR, in
her official capacity as United States Secretary
of Labor,

Defendants.

CASE NO. C24-0637JHC

**JOINT STIPULATION FOR ORDER
EXTENDING NOTING DATE ON
DEFENDANTS' MOTION TO
ALTER OR AMEND
PRELIMINARY INJUNCTION &
ORDER**

(Note on Motion Calendar for:
April 18, 2025)

WHEREAS on April 14, 2025, Defendants filed a motion to alter or amend the preliminary injunction entered in this action on March 28, 2025 (Dkt. # 154); and

WHEREAS on April 15, 2025, the Court ordered that Defendants' motion be renoted to April 24, 2025, and Plaintiff's opposition to the motion be filed by April 18, 2025; and

WHEREAS following the Court's April 15 hearing, the parties have engaged in negotiations in pursuit of an agreement to modify the terms of the preliminary injunction and thereby make it unnecessary for the Court to adjudicate Defendants' motion to alter or amend; and

WHEREAS the parties mutually agree that those discussions have been productive and that they have made progress toward agreement, but they have not yet reached agreement; and

1 WHEREAS the parties are mutually desirous of renoting Defendants' motion and extending
2 the due date for Plaintiff's opposition to allow their negotiations to continue,

3 NOW THEREFORE, the parties, through their respective attorneys of record, do hereby
4 stipulate and agree that the Court may make and enter the following order:

5
6 **Defendants' motion to alter or amend the second preliminary injunction pursuant to**
7 **Rule 59(e), Fed. R. Civ. P., (Dkt. # 154) shall be renoted to April 29, 2025. Plaintiff's**
8 **time to respond to Defendants' motion shall be extended to April 23, 2025.**

9 SO STIPULATED.

10 DATED this 18th day of April 2025.

11
12 TEAL LUTHY MILLER
13 Acting United States Attorney

14 /s/ Brian C. Kipnis
15 BRIAN C. KIPNIS
16 Assistant United States Attorney
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23 Attorneys for Defendants

24 SO STIPULATED.

25 DATED this 18th day of April 2025.

26 COLUMBIA LEGAL SERVICES

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 21st day of April 2025.



JOHN H. CHUN
United States District Judge